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Tank Conference

TRUCK TRAILER MANUFACTURERS ASSOCIATION
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March 7, 1996

Dr. Dharmendra K. Sharma
Administrator
Research and Special Programs Administration
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590

DOT/RSPA/OHMS
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Subject: Petition to add UG-82 to the List of Paragraphs
of the ASME Code Excluded from the Requirements
of Non-ASME Cargo Tanks

Dear Dr. Sharma:

We petition for the revision of 178.346-1(d)(8), 178.347-1(d)(8), and
178.348-1(e)(2)(viii) as follows where underlining indicates additions.

178.346-1

* * *

(d) Each cargo tank must be "constructed in accordance with the
ASME Code" except as modified herein:

* * *

(8) The following paragraphs in parts UG and UW of the ASME
Code, Section VIII, Division I do not apply: UG-11, UG-12, UG-22(g),
UG-32(e), UG-34, UG-35, UG-44, UG-76, UG-77, UG-80, UG-81, UG-82,
UG-96, UG-97, UW-13(b)(2), UW-13.1(f) and the dimensional
requirements found in Figure UW-13.1.

* * *

178.347-1

* * *

(d) Each cargo tank built to this specification with MAWP of 35 psig or less must be "constructed in accordance with the ASME Code" except as modified herein:

* * *

(8) The following paragraphs in parts UG and UW of the ASME Code, Section VIII, Division I do not apply: UG-11, UG-12, UG-22(g), UG-32(e), UG-34, UG-35, UG-44, UG-76, UG-77, UG-80, UG-81, UG-82, UG-96, UG-97, UW-13(b)(2), UW-13.1(f), and the dimensional requirements found in Figure UW-13.1.

178.348-1

* * *

(e) Each cargo tank having a -

* * *

(2) MAWP of 15 psig or less must be "constructed in accordance with the ASME Code," except as modified herein:

* * *

(viii) The following paragraphs in parts UG and UW of the ASME Code, Section VIII, Division I do not apply: UG-11, UG-12, UG-22(g), UG-32(e), UG-34, UG-35, UG-44, UG-76, UG-77, UG-80, UG-81, UG-82, UG-96, UG-97, UW-13(b)(2), UW-13.1(f), and the dimensional requirements found in Figure UW-13.1.

* * *

January 4, 1996

For your ease of reference, UG-82 is reproduced as follows.

UG-82 LUGS AND FITTING ATTACHMENTS

All lugs, brackets, saddle type nozzles, manhole frames, reinforcement around openings, and other appurtenances shall be formed and fitted to conform reasonably to the curvature of the shell or surface to which they are attached.

(a) When pressure parts, such as saddle type nozzles, manhole frames, and reinforcement around openings, extend over pressure retaining welds, such welds shall be ground flush for the portion of the weld to be covered.

(b) When nonpressure parts, such as lugs, brackets, and support legs and saddles, extend over pressure retaining welds, such welds shall be ground flush as described in (a) above, or such parts shall be notched or coped to clear those welds.

Grinding welds at ring attachments is unnecessary and typically adds \$63 per tank.

Sincerely,



Donald W. Vierimaa
Vice President-Engineering

DWV/mm

cc: Dockets Unit, DHM-30
Research & Special Programs Administration

Ron Kirkpatrick
Office of Hazardous Materials Technology, DHM-22
Research & Special Programs Administration

TTMA Tank Conference Engineering Committee